

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

Roddy Prophet,

Plaintiff,

v.

Cuyahoga County,

Ken Mills, in his official and individual  
capacities as Regional Director of  
Corrections for the Cuyahoga County  
Sheriff's Department,

Ronald Shobert, in his official and  
individual capacities as Former  
Administrative Warden for the Cuyahoga  
County Sheriff's Department,

Kenneth Kochevar, in his official and  
individual capacities as Former Director  
of Corrections for the Cuyahoga County  
Sheriff's Department,

Victor McArthur, in his official and  
individual capacities as Associate Warden  
of Corrections for the Cuyahoga County  
Sheriff's Department,

Eric J. Ivey, in his official and individual  
capacities as Associate Warden of  
Corrections for the Cuyahoga County  
Sheriff's Department,

Freddie Ballard, in his official and  
individual capacities as Corrections  
Officer for the Cuyahoga County Sheriff's  
Department,

Dr. Muhammad Momen, Lead Chief  
Clinical Officer at Northcoast Behavioral  
Healthcare, in his individual capacity,

and

Aurelius Hill,

Defendants.

) CASE NO: 1:17-cv-00902

) JUDGE JAMES S. GWIN

) **MEMORANDUM IN SUPPORT OF**  
) **MOTION TO PERMIT LEGAL**  
) **INTERNS TO PARTICIPATE IN**  
) **PROCEEDINGS ON BEHALF OF**  
) **PLAINTIFF RODDY PROPHET**

Plaintiff Roddy Prophet filed a lawsuit against Defendants Cuyahoga County Board of Commissioners, Ken Mills, Ronald Shobert, Kenneth Kochevar, Victor McArthur, Eric Ivey, Freddie Ballard, Dr. Muhammad Momen, and Aurelius Hill. The undersigned, a supervising attorney at the Milton A. Kramer Law Clinic Center at Case Western Reserve University School of Law (“Kramer Center”), is appearing as counsel of record for Plaintiff before this Court.

The undersigned advises the Court that Ms. Ashley Everett, Mr. Ming Guan, and Ms. Katlyn Patton, who are currently enrolled in the Civil Rights, Human Rights, and Immigration Clinic run by the Kramer Center, are certified legal interns under Ohio Sup. Ct. R. Gov. Bar II(1)(3), and are therefore already permitted to participate in litigation matters in Ohio state courts under the supervision of the undersigned. Plaintiff therefore moves the Court to permit the three legal interns to participate in this matter on his behalf as though they were duly licensed attorneys in cases pending before this Court.

Although this Court has no specific rule governing appearances by legal interns, Local Civil Rule 83.6 permits law-student representation in these circumstances. The applicable provisions of that rule permit law students to participate if:

- (1) they are “enrolled in a school of law accredited by the American Bar Association”
- (2) they have “completed one-half of the credit hours required for graduation”;
- (3) parties to the litigation “have advised the Court that they agree to the student[s] participation and that full explanation has been made of the student[s] status”; and
- (4) “the student[s] shall receive no compensation, directly or indirectly, for participation, other than the award of academic credit.”

See Local Civil Rule 83.6, 83.6(a), 83.6(b). The undersigned supervising attorney represents that Ms. Everett, Mr. Guan, and Ms. Patton satisfy criteria (1), (2), and (4), and that parties will be apprised of the students' status after service of the Complaint. In addition, Plaintiff has received a full explanation of the legal interns' status and has agreed to the interns' participation on his behalf. The undersigned also advises the Court that supervising attorneys from the Kramer Center will be present with the legal interns during any Court proceedings in which the Plaintiff's interests may be implicated.

For the reasons set forth above, Plaintiff respectfully submits that the Court should grant his motion to permit Ms. Everett, Mr. Guan, and Ms. Patton to participate in this matter before the Court as counsel for Plaintiff.

Respectfully submitted,

*/s/ Avidan Y. Cover*

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AVIDAN Y. COVER (0087534)  
MILTON A. KRAMER LAW CLINIC CENTER  
CASE WESTERN RESERVE UNIVERSITY  
SCHOOL OF LAW  
11075 East Boulevard  
Cleveland, Ohio 44106  
Telephone: 216.368.2766  
Facsimile: 216.368.5137  
Email: avidan.cover@case.edu

Attorney for Plaintiff Roddy Prophet

**DATED: September 7, 2017**

CV-3716-PLDG-170905-Memorandum in Support of Motion to Permit Intern Participation